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REND ENDORSED

Approved.
Denise Cote
2/20/15

February 19, 2015

Via E-mail and ECF

Hon. Denise L. Cote,
United States District Judge,
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street, Room 1610,
New York, New York 10007-1312.

RECEIVED
ELECTRONICALLY
2/20/2015

Re: FHFA v. Nomura Holding America Inc., et al., No. 11-cv-6201

Dear Judge Cote:

On behalf of all parties, we write to submit proposed redactions to (i) Defendants' Reply in Support of Their Motion to Exclude Certain Testimony of Charles D. Cowan, and supporting materials; (ii) Defendants' Reply in Support of Their Motion to Exclude the Testimony of Dr. Anthony Saunders, and supporting materials, and (iii) Defendants' Opposition to Plaintiff's Motion *in Limine* No. 7, and supporting materials, pursuant to the Court's February 3, 2015 endorsement of Defendants' February 2, 2015 letter (Doc. No. 1214).¹

The parties have met and conferred and agree that, consistent with Sections 2.6, 2.7, 2.8 and 2.9 of the First Amended Protective Order dated January 11, 2013, the exhibits identified in the following charts should be filed under seal or in redacted form because they contain: (1) proprietary information; (2) non-party borrower information; or (3) personal information.

¹ The parties do not have any proposed redactions to Defendants' Reply in Support of Their Motion to Exclude the Testimony of Dr. Anthony Saunders.

Reply Declaration of Elizabeth Cassady in Support of Defendants' Motion to Exclude Certain Testimony of Charles D. Cowan		
Exhibit	Location of Redaction	Reason for Redaction
Exhibit 1	Pg. 29	Personal Information
Exhibit 4	Pgs. 224:11; 224:13; 224:16; 225:2; 225:4; 225:7-8; 225:23; 226:3-4	Borrower Information
Exhibit 5	Pg. 31, Figure 5-1; Pgs. 32-34	Proprietary Information
Exhibit 7	303:11; 303:13; 303:18; 303:21; 303:25; 304:3; 304:9; 304:17-18; 305:3-4; 305:16; 305:19-20	Borrower Information

Defendants' Opposition to Plaintiff's Motion <i>in Limine</i> No. 7		
Exhibit	Location of Redaction	Reason for Redaction
Exhibit A	Pg. 226:4	Personal Information

Highlighted copies of the above-listed exhibits are being submitted to the Court via e-mail.

Hon. Denise L. Cote

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Respectfully Submitted,

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Hon. Denise L. Cote

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